

## Clarks Telecommunications Company

## Certification of Compliance with Applicable Service Quality Standards and Consumer Protection Rules

### Service Quality Standards

Clarks Telecommunications Company:

- Provides voice grade access to the public switched network.
- Provides flat rated local exchange service with no additional charge to end users.
- Provides access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911.
- Provides toll blocking and toll limitation services.
- Advertises the availability of its services and the charges using media of general distribution and on its website.
- Maintains a business office providing customers with access to a customer service representative either in person or via a local telephone call or toll-free telephone number during normal business hours.
- Directs after hour calls to the Company's help desk.
- Directs trouble reports to the on-call technician.
- Tracks all service orders to ensure they are completed in a timely manner.
- Measures its service connection and service interruption performance on a regular basis.
- Trains employees to:
  - Answer all incoming calls promptly.
  - Respond to all inquiries for information promptly and courteously.
  - Investigate thoroughly all customer complaints and handle appropriately according to the Company's guidelines for resolution of customer complaints.
  - Be knowledgeable about products and service offerings so they can assist the customer with selecting the best service option.
- Has a process for periodic inspection, testing and preventive maintenance of its equipment to permit the rendering of safe, adequate and continuous service at all times.

### Consumer Protection Rules

Clarks Telecommunications Company has established operating procedures designed to facilitate compliance with applicable consumer protection rules which include compliance with the Customer Proprietary Network Information (CPNI) rules. The operating procedures include:

- Appointment of a compliance officer.
- A manual detailing the specific procedures for protecting consumer information.
- Employee training on an annual basis.
- A disciplinary process for improper use of consumer information.

**Clarks Telecommunications Company**  
Ability to Remain Functional in Emergency Situations

1. Clarks Telecommunications Company has been providing high quality service in Nebraska since 1958. This includes operating in adverse conditions including blizzards, ice storms, thunderstorms, tornadoes and during prolonged power outages. Clarks Telecommunications Company's management team, plant supervisors, plant technicians and customer service representatives have the training, experience and equipment necessary to respond to, manage and operate in emergency situations.
2. Clarks Telecommunications Company follows applicable Rural Utilities Service (RUS) Telecommunications program practices and guidelines including the Telecommunications Engineering and Construction Manual (TE&CM) and other industry standards available to small telecommunications carriers. Clarks Telecommunications Company also meets the requirements of the Nebraska Public Service Commission (NPSC) as applied to local exchange service.

3. Back-Up Power

- 3.1. Central Office

- 3.1.1. Clarks Telecommunications Company maintains storage batteries in each central office designed to provide a minimum reserve capacity consistent with RUS TE&CM 1751E-302, Power Requirements for Digital Central Office Equipment. 1751E-302 paragraph 2.3.4 recommends a minimum reserve capacity of 8 hours, or 3 hours if the central office is equipped with an emergency standby generator. This is consistent with Title 291, NPSC Telecommunications Rules and Regulations, Chapter 5, paragraph 002.05 Emergency Operations and Power.

- 3.1.2. Clarks Telecommunications Company maintains a dedicated standby generator fueled with natural gas, propane or diesel fuel at each central office location. The standby unit is equipped with an automatic transfer switch so that in the event of an interruption of the commercial electric power lasting more than a few minutes, the standby generator starts automatically and provides electrical power to the central office equipment, air conditioning and building lighting. The automatic transfer switch also exercises the standby unit periodically and an alarm indication is sent if the standby generator does not start so that telecommunications personnel can perform proactive maintenance.

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**3.2. Remote Equipment Cabinets**

3.2.1. Where electronic equipment in cabinets located remotely from the central office, is used to provide service, the cabinets are equipped with batteries designed to operate for a minimum of eight hours without commercial electrical power. In addition, Clarks Telecommunications Company maintains portable AC standby generators for use in the event of prolonged commercial power interruptions and the cabinets are equipped with external receptacles to facilitate connection to portable generators.

**3.3. Optical Network Terminations (ONT's)**

3.3.1. Where Fiber-to-the-Premises (FTTP) technology has been deployed the ONT's are powered by micro-uninterruptable power supplies (UPS) located on the customer premises and powered from the customer's commercial electrical power. The UPS batteries are specified for a minimum of eight hours of reserve capacity. The FTTP electronics system monitors the ONT's and notifies Clarks Telecommunications Company's maintenance personnel when any ONT's batteries are no longer capable of holding the charge required for the designed battery reserve capacity so that Clarks Telecommunications Company can work with the customer to replace the UPS batteries. Clarks Telecommunications Company also maintains a cache of UPS's for routine and emergency replacement.

**4. Rerouting Traffic around Damaged Facilities**

4.1. In the event of damage to cable facilities owned by Clarks Telecommunications Company, our maintenance personnel would restore service using emergency splice kits kept on hand for these types of service disruptions. If the damaged facilities are not owned by Clarks Telecommunications Company we would work with the carrier directly affected to identify the source of disruption and the estimated amount of time before service is restored.

4.2. For those Clarks Telecommunications Company central office locations which have diverse cable routes or are part of a fiber optic ring, critical circuits such as 911 trunks and SS7 A-links are assigned to diverse routes to the extent that this can be coordinated with the connecting carrier(s). Every effort is made to assign

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critical circuits over diverse facilities where available so that a single outage does not isolate customers from critical services.

- 4.3. In the event of an extended outage, contact would be made with another service provider which has a separate, physical cable connection with Clarks Telecommunications Company to provision temporary alternate routes supporting originating and terminating toll calls. Emphasis would first be placed on establishing connections to nearby PSAP, law-enforcement and emergency services.

**5. Managing Traffic Spikes**

- 5.1. Clarks Telecommunications Company Company meets Title 291, NPSC Telecommunications Rules and Regulations, Chapter 5, paragraph 002.12 Dial Service Objectives for sufficient central office capacity and equipment during the "...average busy hour-busy season..."
- 5.2. Clarks Telecommunications Company follows applicable RUS practices 522 and 322 when specifying, administrating, and assigning facilities within its control (as opposed to facilities ordered by connecting interexchange carriers).
- 5.3. Clarks Telecommunications Company uses a Metaswitch soft switch platform. A geo-diverse switching architecture is used whereby redundant Media Gateway Controllers are located in separate physical locations. If a Media Gateway Controller goes out of service at one location, the other Media Gateway Controller continues to support all subtending trunks and access lines at all locations served by the Media Gateway Controller(s).
- 5.4. The Metaswitch will provide performance up to 250,000 Busy Hour Call Attempts (BHCA) of which we are currently operating at 11,741 BHCA. The backplane is non-blocking and will allow 24 DS-0's of traffic to be passed per DS-1 port. When traffic volumes greatly exceed specified criteria and additional capacity of the switch or connecting facilities, the Metaswitch continues to process calls but with potentially longer waiting times for dial tone, higher post-dialing delays and a higher probability of callers receiving all trunks busy indications (fast busy) and having to redial calls. Depending on the magnitude and duration of extreme peak demand, Clarks Telecommunications Company would examine alternatives such as provisioning additional facilities and work with connecting carriers to expedite additional capacity.

## Clarks Telecommunications Company

### Nebraska Telephone Assistance Program Terms and Conditions

#### Nebraska Telephone Assistance Program

The Nebraska Telephone Assistance Program (NTAP) is available for qualifying customers of Clarks Telecommunications Company. NTAP assistance reduces the cost of basic, monthly local telephone service. Eligible consumers can receive up to \$12.75 per month in discounts. In addition, the Federal Universal Service Charge is not assessed to consumers participating in NTAP. Toll Blocking prevents the placement of all long distance calls for which a subscriber would be charged. Toll blocking is available to eligible consumers at no cost. Also, by choosing this option, consumers are usually not charged a deposit.

NTAP is administered by the Nebraska Public Service Commission.

#### NTAP Eligibility Information

##### Program Based Eligibility

To qualify for NTAP, subscribers must either have an income that is at or below 135% of the Federal Poverty Guidelines, or the subscriber, one or more of the subscriber's dependents, or the subscriber's household must receive benefits from one of the following assistance programs:

- Federal Public Housing Assistance (Section 8)
- Medicaid
- Children's Health Insurance Program/Kids Connection (SAM, MAC or EMAC)
- Supplemental Nutrition Assistance Program (SNAP); (formerly the Food Stamps Program)
- Supplemental Security Income (SSI)
- Veteran's Pension Benefit / Survivors Pension Benefit

To receive an NTAP application, contact your local *Health and Human Services* agency caseworker or the *Nebraska Public Service Commission*, 1200 N Street, Suite 300, PO Box 94927, Lincoln, NE 68508-4927, Phone: 402-471-3101, Toll Free: 1-800-526-0017 or [http://www.psc.nebraska.gov/ntips/ntips\\_ntap.html](http://www.psc.nebraska.gov/ntips/ntips_ntap.html)

NTAP applicants must present documentation demonstrating eligibility either through participation in one of the qualifying federal assistance programs or through income-based means.

Acceptable documentation of program-based eligibility includes: current or prior year's statement of benefits from a qualifying state, federal or Tribal program; notice letter of participation in a qualifying state, federal or Tribal program; program participation documents; or another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.

##### Income Based Eligibility

In addition, consumers are eligible for NTAP if their household income is at or below 135% of the federal poverty guidelines.

### 2017 Federal Poverty Guidelines – 135%

Household Size	48 Contiguous States and D.C.	Alaska	Hawaii
1	\$16,281	\$20,331	\$18,711
2	\$21,924	\$27,392	\$25,205
3	\$27,567	\$34,452	\$31,698
4	\$33,210	\$41,513	\$38,192
5	\$38,853	\$48,573	\$44,685
6	\$44,496	\$55,634	\$51,179
7	\$50,139	\$62,694	\$57,672
8	\$55,782	\$69,755	\$64,166
For each additional person, add	\$5,643	\$7,061	\$6,494

Acceptable documentation of income eligibility includes: prior year's state, federal or Tribal tax return; current income statement from an employer or paycheck stub; social security statement of benefits; Veterans Administration statement of benefits; retirement/pension statement of benefits; unemployment/workmen's compensation statement of benefits; federal or Tribal notice of letter participating in General Assistance; or a divorce decree or child support award or other official document containing income information.

#### **Tribal Eligibility**

A subscriber who lives on Tribal lands and is an eligible resident of Tribal lands is eligible for Tribal Lifeline service or Tribal Link Up if the subscriber, one or more of the subscriber's dependents, or the subscriber's household participates in any of the above-listed qualifying assistance programs or one of the following Tribal-specific federal assistance programs: Bureau of Indian Affairs General Assistance; Tribally Administered Temporary Assistance for Needy Families; Head Start (if income eligibility criteria are met); or the Food Distribution Program on Indian Reservations (FDPIR). Tribal subscribers may also qualify if the household income is at or below 135% of the Federal Poverty Guidelines.

Tribal subscribers should contact Clarks Telecommunications Company for additional information on Tribal Lifeline and Tribal Link Up.

#### **Numbers of Minutes-of-Use Provided as Part of NTAP Program Service**

Clarks Telecommunications Company's Voice NTAP service includes unlimited local minutes-of-use within the toll-free calling area. Clarks Telecommunication Company's Voice NTAP Plan does not include any free minutes-of-use for toll. Toll is billed at the standard toll rate depending on which interexchange carrier the consumer subscribes to for toll service. As part of the NTAP service, Toll blocking is available to eligible consumers at no cost.

**Rates**

Subscribers may receive the NTAP credit on any type or grade of local service, including bundled services that are normally offered by Clarks Telecommunications Company. Advertised rates do not include any applicable taxes or surcharges.

**Recertification of NTAP Eligibility**

NTAP recipients are required to recertify their eligibility annually. Failure to properly recertify a recipient's continued eligibility for NTAP will result in termination of the NTAP recipient's monthly NTAP discount and de-enrollment from NTAP.

**Additional NTAP Program Information**

NTAP is limited to one benefit per household, consisting of either wireline or wireless service. A household is defined as an individual or group of individuals who live together at the same address and share income and expenses. NTAP is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

## Clarks Telecommunications Company

**Public Interest Obligations Certification**

To be in compliance with the Public Interest Obligations Certification of providing upon a reasonable request broadband service at actual speeds of 10 Mbps downstream/1 Mbps upstream:

- Clarks Telecommunications Company provides 10 Mbps downstream/1 Mbps upstream to 100% of its service area and, therefore, certifies that it has taken steps to provide broadband service at actual speeds of 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol.
- Clarks Telecommunications Company provides usage capacity that is reasonably comparable to reasonably comparable offerings in urban areas.
- Clarks Telecommunications Company certifies that requests for such service are met within a reasonable amount of time.